

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

ALMA MORENO et al.,)
)
Plaintiffs/Counter Defendants,)
)
v.)
) Civil Action No. 23-cv-589
)
TITLEMAX OF VIRGINIA, et al.,)
)
Defendants/Counter Claimants.)

PLAINTIFFS' MOTION FOR JURISDICTIONAL DISCOVERY

NOW COME PLAINTIFFS, through their counsel, and respectfully move the Court for an Order allowing jurisdictional discovery pursuant to Federal Rule of Civil Procedure 26(d)(1). This motion is only made so that Plaintiffs can provide a full record of a response to Defendants' Motion to Dismiss based on Personal Jurisdiction. Plaintiffs do not waive in any way their arbitration rights; instead this is only done so that this Court can order the exact arbitrations Plaintiffs seek. Without an Order of this Court compelling arbitration, Plaintiffs are left without recourse given TitleMax's long history of refusing to timely participate in arbitration matters and to comply with the Awards entered by the Arbitrators.

TitleMax's North Carolina counsel told the Court it would participate in such discovery at the 16.1 hearing. However, after the hearing, the undersigned only heard from out of state counsel who refused to agree to any such discovery. The parties cannot agree, despite consultation, as outlined in the various filed status reports.

WHEREFORE, Plaintiffs respectfully move the Court for an Order allowing jurisdictional discovery as described in the contemporaneously filed Memorandum in Support of this motion.

This is the 5th day of October, 2023.

/s/ Andrew H. Brown
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N.C. State Bar No. 28450
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FOR THE FIRM:

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